

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

RowVaughn Wells,

Plaintiff,

v.

The City of Memphis *et al.*,

Defendants.

Case No. 2:23-CV-02224

**PLAINTIFF'S MOTION FOR EXTENSION OF TIME TO FILE RESPONSE TO
DEFENDANT CHIEF CERELYN DAVIS'S MOTION TO QUASH**

Plaintiff, through her undersigned counsel, pursuant to Fed. R. Civ. P. 6(b)(1)(A), submits this motion for extension of time to file her response to Defendant Chief Cerelyn Davis's Motion to Quash Subpoena. No Defendant has voiced any objection to the extension requested herein. In support of her motion, Plaintiff states as follows:

1. On May 2, 2025, Defendant Davis filed a motion to quash Plaintiff's subpoena duces tecum ("Motion"). ECF 409. Plaintiff's response brief is currently due May 16.
2. Plaintiff's counsel has been working diligently to prepare Plaintiff's response brief. However, due to multiple obligations in this litigation and in counsel's other matters, counsel requires additional time to complete Plaintiff's response to the City's Motion.
3. Plaintiff respectfully requests an additional 7 days, to and including May 23, 2025, to file her response.
4. This request is made in good faith and not for purposes of delay. The requested extension will not cause prejudice to any party.

5. Plaintiff respectfully submits that, for the foregoing reasons, good cause supports her request for a seven-day extension of time to file her response.

6. Plaintiff conferred via e-mail with all Defendants regarding the relief requested in this motion. Defendants Michelle Whitaker and Demetrius Haley responded that they have no objection. The remaining defendants have not responded as of this filing. No Defendant has voiced any objection.

WHEREFORE, for the foregoing reasons, Plaintiff respectfully requests that this Court enter an order extending the time for Plaintiff to file her response in opposition to Defendant Chief Cerelyn Davis's Motion to Quash Subpoena (ECF 409) by seven days, to and including May 23, 2025.

Dated: May 13, 2025

Respectfully submitted,

/s/ Joshua M. Levin

Antonio M. Romanucci* (Ill. Bar No. 6190290)

Sarah Raisch* (Ill. Bar No. 6305374)

Joshua M. Levin* (Ill. Bar No. 6320993)

Stephen H. Weil* (Ill. Bar No. 6291026)

Sam Harton* (Ill. Bar No. 6342112)

Colton Johnson Taylor* (Ill. Bar No. 6349356)

ROMANUCCI & BLANDIN, LLC

321 N. Clark St., Ste. 900

Chicago, IL 60654

P: (312) 458-1000

aromanucci@rblaw.net

sraisch@rblaw.net

jlevin@rblaw.net

sweil@rblaw.net

sharton@rblaw.net

cjohnson@rblaw.net

David L. Mendelson (Tenn. Bar No. 016812)

Benjamin Wachtel (Tenn. Bar No. 037986)

MENDELSON LAW FIRM

799 Estate Place

Memphis, TN 38187
+1 (901) 763-2500 (ext. 103), Telephone
+1 (901) 763-2525, Facsimile
dm@mendelsonfirm.com
bw@mendelsonfirm.com

Brooke Cluse* (Tex. Bar No. 24123034)
BEN CRUMP LAW, PLLC
717 D Street N.W., Suite 310
Washington, D.C. 20004
+1 (337) 501-8356 (Cluse), Telephone
brooke@bencrump.com

Attorneys for Plaintiff

* Admission *pro hac vice*

CERTIFICATE OF CONSULTATION

On May 9, 2025, Plaintiff conferred via e-mail with all Defendants regarding the relief requested in this motion. Defendants Michelle Whitaker and Demetrius Haley responded that they have no objection. The remaining defendants have not responded as of this filing. No Defendant has voiced any opposition.

/s/ Joshua M. Levin